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6 Counsel for Plaintiff  
**JARED EDWARDS**

7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 JARED EDWARDS,  
11 Plaintiff,

12 v.

13 KEENEN IVORY WAYANS, et al.,  
14 Defendants.

CASE NO. CV10- 2231 R (RCx)

The Honorable Manuel L. Real  
Courtroom 8

**[PROPOSED] VERDICT FORM**

Trial Date: July 12, 2011  
Location: Courtroom 8

1 Plaintiff Jared Edwards respectfully submits the following proposed verdict  
2 form pursuant to Fed. R. Civ. P. 49, L.R. 49, and the Procedures of the Honorable  
3 Manuel L. Real, and respectfully requests permission to supplement or modify this  
4 proposed verdict form as may be necessary or appropriate after submission of all of  
5 the evidence at trial or during an appropriate conference with the Court. Plaintiff  
6 Jared Edwards asserts the following claims against Defendants Keenen Ivory  
7 Wayans, Shawn Wayans, Marlon Wayans and Wayans Bros. Productions (“Wayans  
8 Defendants”) and St. Martin’s Press, LLC (“Defendant SMP”) (collectively, the  
9 Defendants): (1) Copyright infringement in violation of the Copyright Act, 17 U.S.C.  
10 §§ 101 et seq., and (2) Breach of implied contract under California law.



- 1 3. What amount of damages do you find that Jared Edwards has proven, by a  
2 preponderance of evidence, that Defendants caused him as a result of their  
3 copyright infringement?

4 \$\_\_\_\_\_

5 Please continue to Question 4.

6  
7 **BREACH OF IMPLIED CONTRACT**

- 8 4. Do you find that Jared Edwards demonstrated, by a preponderance of the  
9 evidence, that he prepared the work "*You Know You're a Golddigger*  
10 *When...*"?

11 \_\_\_\_\_ Yes \_\_\_\_\_ No

12 If you answered "Yes" to Question 4, please proceed to Question 5.

13 If you answered "No" to Question 4, you have concluded your  
14 deliberations.

- 15 5. Do you find that Jared Edwards demonstrated, by a preponderance of the  
16 evidence, that he disclosed "*You Know You're a Golddigger When...*" for  
17 sale under circumstances from which it could be concluded that Defendants  
18 voluntarily accepted the disclosure knowing the conditions on which it was  
19 tendered?

20 \_\_\_\_\_ Yes \_\_\_\_\_ No

21 If you answered "Yes" to Question 5, please proceed to Question 6.

22 If you answered "No" to Question 5, you have concluded your  
23 deliberations.



1 SUBMITTED BY:

2 Dated: July 5, 2011

THOMPSON WIGDOR LLP

3  
4 By: \_\_\_\_\_/s/\_\_\_\_\_

Kenneth P. Thompson, Esq.

5 Basil C. Sitaras, Esq.

6 Attorneys for Plaintiff Jared Edwards  
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